



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 3, 2002

BRAC Environmental Coordinator
Base Realignment and Closure, Environmental Division
Attn: Mr. Dean Gould
P.O. Box 51718
Irvine, CA 92619-1718

RE: Site Specific Environmental Baseline Survey, Planning Area Zones 1 and 36, Former
Marine Corps Air Station, El Toro, dated August 30, 2002.

Dear Mr. Gould:

EPA has reviewed the Site Specific Baseline Survey for Planning Area Zones (PAZ) 1 and 36, which are both currently used for agricultural purposes. The purpose of this site specific EBS is to confirm the status assigned to these parcels in the 1995 EBS. The sampling for these sites follows the sampling protocol used in the Installation Restoration Program Community Environmental Response Facilitation Act Confirmation Sampling Program Technical Memorandum, dated March 1995.

We have the following general and specific comments:

General Comments:

1. Any buildings or structures located or previously located on the parcels should be shown on a map. The map should also show topography and drainage patterns.
2. Table 4-1, 4-2, 4-3 and Appendix A, Risk Screening Tables, should show detection limits.
3. The following statement is made in several locations of the report, "...however, this value is below the level that would trigger remediation (10-4 or a risk ratio of 100). EPA has always maintained that anything within the risk range (10-4 to 10-6) could "trigger" remediation. If risks are within in this range, they generally require further evaluation based on site-specific circumstances. Remediation may or may not be required based on this evaluation. Please remove this statement from the text of the EBS.

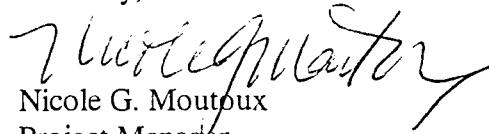
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10/9/02

Specific Comments:

1. P. 4-11, Field Sampling: In paragraph 2, it is stated that AG1-HA3 was moved directly northwest of the original sampling location (CP6-B3) because this original location is now under a reservoir. Because this new location is now approximately 500 feet from the original location, the results from CP6-B3 should be included in the screening risk assessment.
2. P. 4-15, Results and Conclusions: The second paragraph of this section discusses the sample AG1-HA3 which was relocated approximately 500 feet northwest from the 1994 sample (CP6-B3) due to a constructed reservoir. The last sentence in the paragraph then goes on to compare the risks calculated for CP6-B3 and AG1-HA3. Given the distance apart of the two samples, this does not appear to be a valuable comparison upon which conclusions can be drawn.
3. P. 5-3, Drainage Sumps: Please provide more information about the types of wastes that may have been disposed of this sump as well as whether the sump is lined and whether any samples were taken around the sump.
4. P. 5-9, Pesticides and Herbicides (and P. 7-2, Property Classification): Given that the extent of contamination around the pesticide mixing area is not known, please provide justification for how the area designated as ECP Category 7 was determined.

If you have any questions, please call me at (415) 932-3012.

Sincerely,



Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Kyle Olewnick, SWDIV
Triss Chesney, DTSC
John Broderick, RWQCB
Jerry Werner, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Chair
Polin Modanlou, County of Orange